U.S. Environmental Protection Agency
Applicability Determination Index

Control Number: C960004

Category: CFC
EPA Office: CCSMD
Date: 09/22/1994
Title: Automotive Service
Recipient: Dibble, Christine
Author: Bromm, Susan

Abstract:

Q. May an automotive service facility without certified technicians and recovery/ recycling equipment perform any work on automotive air-conditioning systems?

A. Yes, such a facility may perform work that does not involve the refrigerant for the air-conditioning systems.

Letter:

MEMORANDUM

SUBJECT: Clarification of July 22, 1994 Section 609 Applicability Determination

FROM: Susan E. Bromm, Director
Chemical, Commercial Services
and Municipal Division

TO: Christine Dibble, Policy Analyst
Stratospheric Protection Division, Office of Atmospheric Programs

This is in response to your discussions with Dawn Banks-Waller on August 23, 1994 in which you requested clarification of the "mobile" Section 609 automotive air conditioning service that was discussed in the July 22, 1994 applicability determination which this office sent to Molly Magoon of the Agency's Region 1 office. Specifically, you wondered how that discussion might affect your response to a request you received on August 19, 1994 from the New York State Department of Motor Vehicles Division of Public Safety (NYS DMV), asking you to confirm:

"that an automotive repair shop, body repair shop, automotive dealer, or any other facility. . . [which] services a motor vehicle can . . . sub-contract MVAC service work to an off-site facility, which will be performed by a trained and certified Section 609 technician, using approved MVAC recovery/recycling equipment."

Any facility that services automotive systems and does not have on its premises Section 609 approved recovery/recycling equipment and a Section 609 certified technician ("non-609 facility"), may service automotive air-conditioning systems as long as the work does not involve the refrigerant for such systems. For example, an automobile body repair shop may replace a condenser if that replacement will not cause loss of refrigerant. The refrigerant may have already escaped from the air-conditioning system during a collision.